



Mr. Donald S. Clark, Secretary  
Federal Trade Commission  
Room H-159  
600 Pennsylvania Avenue, N.W.  
Washington, D.C. 20580

Date: May 5, 2004  
Re: Project No. P044506: Privo Safe Harbor Proposal

Dear Mr. Clark:

I respectfully submit these comments in response to the FTC's request for public comment on the application of Privo, Inc. for Safe Harbor Status. In reviewing Privo's application, I found that Privo's proposal fully adheres to, or in many cases exceeds, the provisions of the Children's Online Privacy Protection Act ("COPPA") while providing excellent mechanisms to ensure operator compliance and consumer empowerment. I offer you my support to approve Privo, Inc. as a Safe Harbor.

Intelligence Research Group ("IRG") is a full-service provider of networking and Internet technology solutions to a diverse cross-section of clients from the business and entertainment worlds, from Fortune 500 corporations to regional businesses. Founded in 1992, the company has developed a track record of innovation spanning all forms of interactive media, networking, and custom software solutions that create a connection between brands and consumers for our clients.

As IRG's Managing Director, I am personally involved in advising our clients on various marketing strategies. During this process I frequently come across the same challenge – how to effectively interact with young consumers while adhering to COPPA. I have reviewed the Privo solution, and I have been impressed by its effectiveness in resolving this challenge. Privo's model will enhance the consumer experience by guiding present and future marketers through a path of mutual consent.

In my overall experience dealing with numerous websites concentric to young consumers including *Conagra Foods, Inc.*, *Random House Children's Books (Golden Books)*, *Mattel Inc.*, *Nestlé USA* and *EAA Young Eagles*, I find there is a market need for an independent company to provide a 3<sup>d</sup> party mechanism for obtaining and verifying parental permission as required by COPPA, in a way that is easy and empowering for the consumer. The Safe Harbor program would put prospective Privo clients' and users' minds at ease that Privo's COPPA adherence is valid in the eyes of the FTC.

Privo is visionary in the marketplace in its promotion of responsible permission marketing and parental empowerment in regard to the online activities of youth. Privo's proposal demonstrates its commitment to meeting, and in many cases, exceeding the standards of Children's Online Privacy Protection Act. Privo's Privacy Assurance Program tracks the COPPA requirements for providing parental notice, choice, consent, data confidentiality, and security.

Privo also provides the necessary mechanisms to receive, address and respond to consumer questions and concerns. Their parental permission process will greatly enhance the privacy of the consumer, as well as help to retain the privileges of the marketer with the family, by being clear about data management and communication practices (i.e. opt-in e-mail choices will distinguish responsible marketers from spammers).

Privo has made a public commitment to provide secure data handling for sensitive children's contact data with procedures that may be superior to many internal family brand customer service

departments. For parents, there is a need for a centralized service such as provided by Privo: parents can go through the verification process one-time to get a username and password that they can use to authorize their children to participate at other Privo-enabled websites or promotions.

Privo has developed a solution specifically matched to the needs of industry. By providing this solution as its core business, Privo can offer a reasonably priced out-source option to industry. Privo enables its client companies to offer children the most desirable online activities (i.e. communications tools) while ensuring that parents are informed, and have truly given their consent for participation. This is a major step toward greater safety for youth online.

Privo's Privacy Assurance Program offers a thoroughly effective mechanism to assess and promote corporate compliance with the COPPA Guidelines. For the reasons I have mentioned, I enthusiastically encourage the FTC to approve Privo's application for Safe Harbor as it was submitted. I am confident that the program provides a meaningful permissions management solution for industry that will foster parental empowerment, and safe and enjoyable activities for children online.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Francesco Mancini', with a horizontal line extending from the end of the signature.

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